

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

PENG WANG, QINLIN LI, and YISI
WANG,

Plaintiffs,

v.

KEN PAXTON, Attorney General of Texas,
in his Official Capacity, only.

Defendant.

Case No.

DECLARATION OF PENG WANG

I, Peng Wang, being of competent mind and over the age of 18, declare as follows:

1. I am a Chinese citizen and a resident of Fort Worth, Texas. I have lived in Texas for about 16 years.
2. I am one of the plaintiffs in the above-captioned civil action.
3. I am not a member of the Chinese communist party and has no affiliation with the Chinese government.
4. I am a law-abiding individual without any criminal record.
5. I have lived in Texas for more than ten years, and have built my social network here.
6. I am a devout Christian and currently an international student with an F-1 visa pursuing a Master of Divinity degree at a seminary school in Texas. I expect to graduate in late 2026 or early 2027, and I hope to work as a worship pastor at a local church.
7. I am also a musician and plays instruments at several local orchestras as well as lead Sunday worship service at a local church.

8. I currently rent an apartment in Fort Worth, Texas, and the lease will expire in this December. After the expiration, I wish to continue renting an apartment in the greater Fort Worth-Dallas area to finish my degree and seek employment opportunities to become a pastor.

9. Most of the apartments for rent in the Fort Worth area require signing a lease of one year or longer.

10. Renting for less than a year will be too expensive. It also causes too much uncertainty if we have to move frequently due to constant living in short term rentals.

11. I am shocked and ashamed to learn that Texas has passed SB 17 that treats me like some kind of national security threat just because of my race and where I come from. I do not understand why Texas adopts a blanket restriction against such a large group of people, and I see no reason why renting an apartment should be considered a danger to this country. The new law will cast a cloud of suspicion over me as a Chinese person.

12. One particular provision of SB 17 affects me the most. The law appears to allow a lease of “improvements constructed on a leasehold” if the lease term is shorter than one year. I am not a lawyer and I honestly have no idea if an apartment unit is “improvements constructed on a leasehold”. If yes, I must look for a new apartment and sign a shorter-than-one-year lease, which will be difficult because I know most landlords do not bother to deal with short-term renters. Even if some of them do, it is highly likely they will demand higher rents, which will be a great financial burden for a student like me. If an apartment unit is not “improvements constructed on a leasehold”, I am not allowed to rent at all, which will force me leave Texas when my current lease expires in December to comply with SB 17 and not to face a felony charge. This means I will have to give up my study and the social networks I

have built here.

13. I have always believed that the United States is the land of opportunity and equality, and everyone has a chance to realize the American Dream. Now I have learned that this is not the case if I am Chinese. SB 17 stigmatizes me and wrongly treats me as suspicious because I am Chinese, and will limit my social and career possibilities. I believe that I have been singled out by the law simply because of where I came from, my ancestry, and my alienage status. I am deeply saddened and I respectfully ask the court to declare SB17 invalid.

14. On June 30, 2025, I spoke with my attorney Keliang “Clay” Zhu extensively about the nature of a class action and the potential advantages and disadvantages to me by bringing a class action rather than going individually. I bring this case with the understanding that I am serving as a volunteer not only to protect my own rights, but to protect the rights of all people affected by the law, which is why I agree to become a plaintiff and a representative of the class.

15. I am willing and able to fulfill my obligations as class representatives, including responding to reasonable discovery requests, with the help of my lawyers to protect the fundamental constitutional rights of the class that I represent. I discussed with my lawyer the responsibility of pursuing a class action on behalf of people covered by the law, whether because they are Chinese or because they are from one of the other three countries covered by SB 17.

16. I am familiar, and can demonstrate that familiarity, with the allegations in this lawsuit. After talking with my lawyer, I understand the concept of a class action, and the relief sought in this action.

I declare under the penalty of perjury that the forgoing is true and accurate, and that

this declaration is executed at Fort Worth, Texas on July 2nd, 2025.



Peng Wang